

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SMITH & NEPHEW, INC.,)	
)	
Plaintiff,)	
)	CIVIL ACTION
vs.)	NO. 10-cv-10951-RWZ
)	
INTERLACE MEDICAL, INC., and)	
HOLOGIC, INC.,)	
)	
Defendants.)	

**INTERLACE'S ASSENTED-TO MOTION
TO SEAL PAPERS FILED IN OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Rules 5.4(G)(1)(a) and 7.2, Interlace Medical, Inc. moves that its (a) response to Smith & Nephew's motion for summary judgment and (b) response to Smith & Nephew's statement of undisputed material facts (the "Opposition Documents"), filed with the Court on January 27, 2012, be impounded and placed under seal. As grounds for this motion, Interlace states as follows:

1. Pursuant to the protective order entered in this lawsuit, documents designated confidential and highly confidential can be disclosed only to certain individuals identified in the protective order.
2. The Opposition Documents contain information that one or both parties have designated confidential and/or highly confidential. Therefore, Interlace requests that the Court impound its Opposition Documents.
3. Interlace proposes that the impounding order be lifted only upon further order of the Court, and that the Opposition Documents be kept in the clerk's nonpublic information file during any post-impoundment period.

WHEREFORE, Interlace respectfully requests that the Court allow this motion to impound.

Dated: January 27, 2012

Interlace Medical, Inc., and
Hologic, Inc.

By their attorneys,

/s/ Joel R. Leeman

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CERTIFICATE OF SERVICE

I certify that a true copy of the above document was filed through the Court's ECF system on the above date and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joel R. Leeman

Joel R. Leeman